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April 30, 2001

VIA FACSIMILE – 1-312-886-4071
and Airborne

Deena Sheppard-Johnson, SR-6J
Remedial Enforcement Support Section
U.S. Environmental Protection Agency
77 West Jackson Blvd.
Chicago, IL 60604

RE: The Chemical Recovery Systems Site, Elyria, Ohio

Dear Ms. Sheppard-Johnson:

This letter is in response to the Agency's March 2, 2001, Request for Information addressed to Bridgestone/Firestone, Inc. ("the Company") at 50 Century Blvd., Nashville, TN 37214. On March 26, 2001, you kindly granted Bridgestone/Firestone, Inc. an extension of time, to and including April 30, 2001, to respond to the request. A copy of correspondence dated March 27, 2001, confirming this extension is attached hereto as Exhibit "A".

As noted below, following a diligent search and inquiry, the Company has been unable to locate any document or other information which refers to or relates to the Chemical Recovery Systems Site in Elyria, Ohio (hereinafter referred to as "the Site"), or which tends to indicate that the Company arranged for disposal of any hazardous substances at the Site.

PRELIMINARY STATEMENT

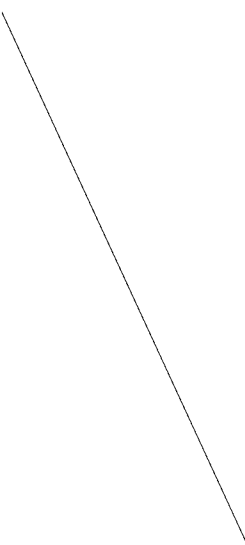
At the outset, the Company denies any implication that a waste disposal connection exists between the Company and the Site which would trigger any potential liability on the part of the Company under the Comprehensive Environmental Response Compensation & Liability Act (CERCLA). The Company has not discovered any information from its own files to date demonstrating a waste disposal connection between the Company and the Site.¹

¹ Although the Agency has furnished BFS with copies of purported inventory documents which mention BFS, we have no information concerning the circumstances surrounding their creation or their evidentiary foundation. Therefore, the Company does not concede the sufficiency or reliability for these documents in establishing a waste disposal connection between the Company and the Site.





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While the Company has carried out a search for the information requested, it should be noted that the Company objects generally to the information request in this matter because it is overly broad. Further, the request imposes an undue burden upon the Company and, in the absence of any established connection between the Company and the Site, it becomes arbitrary and an abuse of discretion. Furthermore, the request is beyond the scope of the Agency's authority pursuant to CERCLA §104(e), 42 U.S.C. §9604(e).

The Company specifically objects to the information request to the extent that it purports to require the Company to respond on the basis not only of all information and documents in its control, but instead to provide all information and documents in the possession, custody, and control of its former employees, agents, servants, contractors, and attorneys. As a general rule, a Company is required to research and provide only information and documents in its possession, custody, or control. Therefore, the Company objects to the information request to the extent that it purports to impose upon the Company an obligation to research, investigate, and provide information from other persons.

The Company also objects to what it believes is a vague and inaccurate reference to 18 U.S.C. §1001. Any information provided by the Company is based on a reasonable investigation and search of records kept in the ordinary course of business, and responses are based on that reasonable records search and investigation. 18 U.S.C. §1001 applies only to knowing and willful falsification or concealment and is not applicable to all circumstances wherein it is claimed that information is false or fictitious.

The Company further objects to the format of the questionnaire and the request that a notarized certification accompany the response. The Company is unaware of any requirement under CERCLA or otherwise that imposes such a duty. The matters that are the subject of this request, and the Company's response, are not within the personal knowledge of the undersigned. There is no officer, or other individual, who has personal knowledge of all such matters. This letter constitutes the corporate response of Bridgestone/Firestone, Inc. to the information request and is based upon information accumulated by and from employees and counsel for the Company. The undersigned is authorized to and has signed the responses for the Company.

Pursuant to discussions with and the agreement of Thomas Nash, Assistant Regional Counsel, the Company's response is limited to the facilities included in its Akron complex. These facilities include Bridgestone/Firestone, Inc., Plant 1, 1200 Firestone Parkway, Akron, Ohio 44317; Bridgestone/Firestone, Inc., Plant 2, 1560 Firestone Parkway, Akron, Ohio 44317; Steel Products, 1600 Firestone Parkway, Akron, Ohio 44317; Central Research Laboratories, 1659 South Main Street, Akron, Ohio 44301; Central Research Pilot Plant, 381 West Wilbeth Road, Akron, Ohio 44301; and Synthetic Rubber & Latex Company, 381 West Wilbeth Road, Akron, Ohio 44301.

Subject to and without waiver of the foregoing objections and general comments, the Company has nonetheless attempted to make a reasonable and diligent search and inquiry for the requested information, it has determined the following:

REQUESTS

1. Identify all persons consulted in the preparation of the answers to these questions.

ANSWER: These responses constitute a corporate response which is signed by the undersigned as counsel for the Company. The responses are based upon information provided or researched by Company employees or its counsel and upon records regularly kept by the Company in the ordinary course of business. The following persons were consulted in the preparation of the Company's response: Alva King, Environmental Consultant; Joseph A. Dembeck, Jr., Project Engineer, Process Uniformity Group; Thomas Anderson, retired Administrative Scientist, Central Research. The Company reserves and does not waive any and all privileges which may apply to these individuals including, but not limited to, the attorney-client and attorney work product privileges.

2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these questions and provide copies of all such documents.

ANSWER: As stated above, BFS has reviewed records kept in the ordinary course of business, including records maintained by BFS' Environmental Affairs Department.

3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any questions or who may be able to provide additional responsive documents, identify such persons.

ANSWER: The Company is not aware of the identity of any such persons.

4. List the EPA Identification Numbers of the Respondent.

ANSWER: Bridgestone/Firestone, Inc., Plant I – OHD001288109; Bridgestone/Firestone, Inc., Plant 2 – not applicable (plant closed in 1978 prior to RCRA notification requirements); Bridgestone/Firestone, Inc., Steel Products Division – OHD087234674; Bridgestone/Firestone, Inc., Central Research Laboratories – OHD000817221; Bridgestone/Firestone, Inc., Central Research Pilot Plant – OHD980681886; Bridgestone/Firestone, Inc., Synthetic Rubber & Latex Company – OHD00817239.

5. Identify the acts or omissions of any person, other than your employees, contractors, or agents that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants and damages resulting therefrom at the CRS Site.

ANSWER: The Company has not identified any documents or information from its own files to date which is responsive to this request.

6. Identify all persons including Respondent's employees, who have knowledge or information about the generation, use, treatment, storage, disposal, or other handling of material at or transportation of materials to the Site (operating as Obitts Chemical Company or Chemical Recovery Systems, Inc., at 142 Locust Street, Elyria, Ohio).

ANSWER: As stated above, following a diligent search and inquiry, the Company has been unable to locate any document or other information from its own files to date which refers or relates to the Site or which tends to indicate that the Company arranged for the disposal of any hazardous substances at the Site.

7. Describe all arrangements that Respondent may have or may have had with each of the following companies and persons:

- a) Obitts Chemical Company;
- b) Russell Obitts;
- c) Chemical Recovery Systems, Inc.;
- d) Peter Shagena;
- e) James Freeman;
- f) James "Jim" Jackson;
- g) Donald Matthews;
- h) Bob Spears;
- i) Bill Bromley;
- j) Carol Oliver;
- k) Nolwood Chemical Company, Inc.;
- l) Art McWood;
- m) Chuck Nolton;
- n) Michigan Recovery System, Inc.;
- o) Chemical Recovery Systems of Michigan.

ANSWER: As stated above, following a diligent search and inquiry, the Company has been unable to locate any document or other information from its own files to date to indicate that the Company had any arrangements or business relationships pertaining to the Site with any of the individuals or entities identified in this request. Nor has the Company identified any documents or information

indicating that it had any arrangement or business relationship with any other person or entity relating to the Site.

8. Set forth the dates during which the Respondent engaged in any of the following activities:
- a) generation of hazardous materials which were sent to the CRS Site;
 - b) transportation of any material to the CRS Site.

ANSWER: As stated above, following a diligent search and inquiry, the Company has been unable to locate any document or other information from its own files to date which refers to or relates to the Site or which tends to indicate that the Company arranged for the disposal of any hazardous substances at the Site.

9. Identify all persons, including yourself, who may have arranged for disposal or treatment, or arranged for transportation for disposal or treatment, of materials, including, but not limited to, hazardous substances, at the CRS Site. In addition, identify the following:
- a) The persons with whom you or such other persons made such arrangements;
 - b) Every date on which such arrangements took place;
 - c) For each transaction, the nature of the material or hazardous substance, including the chemical content, characteristics, physical state (e.g., solid, liquid), and the process for which the substance was used or the process which generated the substance;
 - d) The owner of the materials or hazardous substances so accepted or transported;
 - e) The quantity of the materials or hazardous substances involved (weight or volume) in each transaction and the total quantity for all transactions;
 - f) All tests, analyses, and analytical results concerning the materials;
 - g) The person(s) who selected the CRS Site as the place to which the materials or hazardous substances were to be transported;
 - h) The amount paid in connection with each transaction, the method of payment, and the identity of the person from whom payment was received;
 - i) Where the person identified in g., above, intended to have such hazardous substances or materials transported and all evidence of this intent;
 - j) Whether the materials or hazardous substances involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;
 - k) What was actually done to the materials or hazardous substances once they were brought to the CRS Site;

- l) The final disposition of each of the materials or hazardous substances involved in such transactions;
- m) The measures taken by you to determine the actual methods, means, and site of treatment or disposal of the material and hazardous substance involved in each transaction;
- n) The type and number of containers in which the materials or hazardous substances were contained when they were accepted for transport, and subsequently until they were deposited at the CRS Site, and all markings on such containers;
- o) The price paid for (i) transport, (ii) disposal, or (iii) both of each material and hazardous substances;
- p) All documents containing information responsive to a – o above, or in lieu of identification of all relevant documents, provide copies of all such documents;
- q) All persons with knowledge, information, and documents responsive to a – p above.

ANSWER: As stated above, following a diligent search and inquiry, the Company has been unable to locate any document or other information from its own files to date which refers to or relates to the Site or which tends to indicate that the Company arranged for the disposal of any hazardous substances at the Site.

10. Identify all liability insurance policies held by Respondent from 1960 to the present. In identifying such policies, state the name and address of each insurer and of the insured, the amount of coverage under each policy, the commencement and expiration dates for each policy, whether or not the policy contains a "pollution exclusion" clause, and whether the policy covers or excludes sudden, nonsudden, or both types of accidents. In lieu of providing this information, you may submit complete copies of all relevant insurance policies.

ANSWER: The Company objects to this request on the grounds that the Agency has not established the need for nor the relevancy of such information in this case. Further, the Company is not aware of any statutory authority which permits the Agency to obtain specific information concerning insurance coverage. Subject to and without waiver of the foregoing objections, the Company states that it has a large number and a wide variety of insurance policies which may or may not be applicable or relevant. No determination has yet been made that any particular policy of insurance would or would not provide coverage with respect to the Site. If the Agency determines that specific insurance information is required, please contact the undersigned.

11. Provide copies of all income tax returns, including all supporting schedules, sent to the Federal Internal Revenue Service in the last five years.

ANSWER: The Company objects to this request on the grounds that the Agency has not established the need for nor the relevancy of such information in this case. If the Agency is seeking information relating to the Company's ability to pay for a site cleanup, should there be some basis for liability, which liability is denied, the Company's most recent auditor's financial statement (Income Statement and Balance Sheet) would provide sufficient evidence that adequate financial resources are available. If a copy of this financial statement is required, please contact the undersigned.

12. If Respondent is a Corporation, respond to the following requests:

- a) Provide a copy of the Articles of Incorporation and By-Laws of the Respondent;
- b) Provide Respondent's financial statements for the past five fiscal years, including, but not limited to, those filed with the Internal Revenue Service and Securities and Exchange Commission;
- c) Identify all of Respondent's current assets and liabilities and the person(s) who currently own(s) or is (are) responsible for such assets and liabilities.
- d) Identify the Parent Corporation and all Subsidiaries of the Respondent.

ANSWER: The Company objects to this request, including all subparts, on the grounds that the Agency has not established the need for nor the relevancy of such information. If the Agency is seeking information relating to the Company's ability to pay for a site cleanup, should there be some basis for liability, which liability is denied, the Company's most recent auditor's financial statement (Income Statement and Balance Sheet) would provide sufficient evidence that adequate financial resources are available. If a copy of this financial statement is required, please contact the undersigned. Subject to and without waiver of the foregoing objections, and by way of further response, Bridgestone/Firestone, Inc. was incorporated on March 4, 1910, in the State of Ohio as The Firestone Tire & Rubber Company. Its principal place of business is 50 Century Boulevard, Nashville, TN 37214. On August 1, 1989, The Firestone Tire & Rubber Company changed its name to Bridgestone/Firestone, Inc.

13. If Respondent is a Partnership, respond to the following requests:

- a) Provide copies of the Partnership Agreement;
- b) Provide Respondent's financial statements for the past five fiscal years, including, but not limited to, those filed with the Internal Revenue Service and Securities and Exchange Commission;

April 30, 2001

- c) Identify all of Respondent's current assets and liabilities and the person(s) who currently own(s) or is (are) responsible for such assets and liabilities;
- d) Identify all subsidiaries of the Respondent.

ANSWER: Not applicable.

14. If Respondent is a Trust, respond to the following requests:

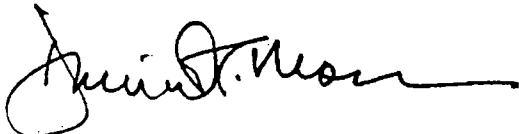
- a) Provide all relevant agreements and documents to support this claim;
- b) Provide Respondent's financial statements for the past five fiscal years, including, but not limited to, those filed with the Internal Revenue Service and Securities and Exchange Commission;
- c) Identify all of Respondent's current assets and liabilities and the person(s) who currently own(s) or is (are) responsible for such assets and liabilities.

ANSWER: Not applicable.

We trust that the foregoing constitutes a sufficient response to the Agency's information request. Please direct any future inquiries or correspondence regarding this response to the undersigned. Any other communications regarding the Site should be directed to Heidi Hughes Bumpers, at Jones, Day, Reavis & Pogue, telephone 202-879-3939, facsimile 202-626-1700.

Very truly yours,

HANNA, CAMPBELL & POWELL



David T. Moss

DTM/lmp

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March 27, 2001

VIA FACSIMILE – 1-312-886-6064

Deena Sheppard-Johnson, SR-6J
Remedial Enforcement Support Section
U.S. Environmental Protection Agency
77 West Jackson Blvd.
Chicago, IL 60604

Re: The Chemical Recovery Systems Site, Elyria, Ohio

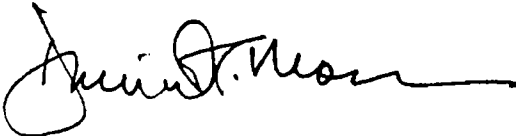
Dear Ms. Sheppard-Johnson:

This letter confirms your voicemail message of March 26, 2001, wherein you kindly granted Bridgestone/Firestone, Inc. an extension of time to and including April 30, 2001, to respond to the above-captioned information request.

Thank you for your attention to this matter.

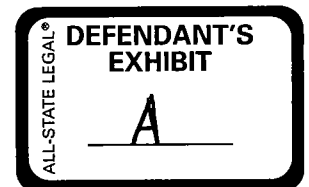
Very truly yours,

HANNA, CAMPBELL & POWELL, LLP



David T. Moss

DTM/lmp
cc: Thomas Nash, U.S. EPA
<<HCP 53320v1>>



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Dave Moss 330-670-7326

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Chicago IL 60604
Deena Sheppard - Johnson, SK-63

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